# United States Bankruptcy Court
# Eastern District of Pennsylvania

In re:

William Steven Stanaitis and Penny Mifflin Stanaitis,

Debtor.

Case No. 23-12187-pmm

Chapter 13

Related to ECF No. 37

## Debtor's Objection to Motion for Relief from Stay filed by Citizens Bank, N.A.

**AND NOW**, Debtors William Steven Stanaitis and Penny Mifflin Stanaitis, by and through their attorney, hereby objects to the Motion for Relief from Stay filed by Citizens Bank, N.A. Because the purported arrearage that gave rise to the Motion can be timely paid directly or through the chapter 13 plan, no grounds for relief exist and the Motion must be denied.

**NOW, THEREFORE**, the Debtors ask this Court to deny the Motion in the form of order attached and to grant such other and further relief in their favor as may be necessary and proper under the law.

Date: January 23, 2024

CIBIK LAW, P.C.
*Counsel for Debtor*

By: */s/ Michael A. Cibik*
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## Certificate of Service

I certify that on this date I caused a true and correct copy of the Debtor's Objection to Motion for Relief from Stay filed by Citizens Bank, N.A. to be served on all parties on the clerk's service list through the CM/ECF system.

Date: January 23, 2024

*/s/ Michael A. Cibik*
Michael A. Cibik

**UNITED STATES BANKRUPTCY COURT**
**EASTERN DISTRICT OF PENNSYLVANIA**

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| In re: | Case No. 23-12187-pmm |
| William Steven Stanaitis and Penny Mifflin Stanaitis, | Chapter 13 |
| Debtor. | Related to ECF No. 37 |

**Order Denying Motion for Relief from Stay filed by Citizens Bank, N.A.**

      **AND NOW**, upon consideration of the Motion for Relief from Stay filed by Citizens Bank, N.A., and the Debtor's objection thereto, and after notice and hearing, it is hereby **ORDERED** that the Motion is **DENIED**.

Date: _____

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Patricia M. Mayer
U.S. Bankruptcy Judge